

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	Case No.: 23-21124 GLT
)	
Charles R. Chadwick and)	Chapter 7
Carin E. Chadwick,)	
)	Document No.: _____
Debtors.)	
)	
Charles O. Zebley, Jr.,)	
)	
Trustee/Movant,)	
)	
vs.)	
)	
Charles R. Chadwick and)	
Carin E. Chadwick,,)	
)	
Debtors/Respondents.)	

MOTION OF TRUSTEE TO APPOINT HIS OWN ATTORNEY

AND NOW, comes Movant, Charles O. Zebley, Jr., Trustee in the above captioned Chapter 7 proceeding, and respectfully represents as follows and declares under penalty of perjury:

1. The Debtors, Charles R. Chadwick and Carin E. Chadwick ("Debtors"), originally commenced the within case by filing a voluntary petition for relief under chapter 7 of the Bankruptcy Code on May 24, 2023.
2. This proceeding is a core proceeding over which this court has jurisdiction under 11 U.S.C. §157(b)(1).
3. Movant is the duly appointed Trustee in the above captioned case.
4. To perform his duties as Trustee, your Movant requires the services of attorneys in connection with this case and specifically, for the following purposes:
 - a. To help the Trustee gather the assets of the Estate;
 - b. To advise the Trustee in any and all legal matters affecting the Estate;
 - c. If needed, to aid the Trustee in selling assets of the Estate and making proper distribution thereof; and,

- d. To pursue any causes of action on behalf of the Debtor or which may be filed against the Debtors.
5. For the foregoing and all other necessary and proper purposes, Trustee desires to serve as his own attorney together with the law firm of Zebley Mehalov & White of which he is a shareholder.
6. Because Charles O. Zebley, Jr., and the law firm of Zebley Mehalov & White practice regularly in matters of this character and because of their experience in this field, Movant believes that they are well qualified to serve as the Attorney for the Trustee in this case.
7. Charles O. Zebley, Jr., and Zebley Mehalov & White wish to be paid based on an hourly rate at the billing rates in effect at the time they render those services together with all costs advanced subject to the approval of the Court after the rendering of such services. A list of Zebley Mehalov & White, P.C. timekeepers and current hourly rates appears in Exhibit "A" to this motion.
8. Charles O. Zebley, Jr., and Zebley Mehalov & White, have no connection with the Debtor, creditors, or any other party in interest, or their respective attorneys or accountants. Charles O. Zebley, Jr., and Zebley Mehalov & White, do not hold or represent an interest adverse to the estate with respect to the matters in which the attorney is employed, and the employment of the attorney is in the best interest of the estate. The statement of disinterest is attached as Exhibit "B."
9. The aforesaid counsel are admitted to practice before this Court, and are familiar with bankruptcy practice and procedures.

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order appointing Charles O. Zebley, Jr., Esquire and the law firm of Zebley Mehalov & White as attorney for the Trustee in this case.

ZEBLEY MEHALOV & WHITE, P.C.

Dated: October 12, 2023

BY/s/ Charles O. Zebley, Jr.
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